

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE)	
INTEL CORPORATION)	MDL No 05-1717-LPS
MICROPROCESSOR ANTITRUST)	
LITIGATION)	
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PHIL PAUL, on behalf of himself)	
and all others similarly situated,)	C.A. No. 05-485-LPS
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Plaintiffs,)	CONSOLIDATED ACTION
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v.)	
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INTEL CORPORATION,)	
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Defendants.)	

**STIPULATION AND PROPOSED ORDER FURTHER MODIFYING
CASE MANAGEMENT ORDER NO. 4**

WHEREAS, on June 3, 2008 the Court entered Case Management Order No. 4 (D.I. 955 in Docket 05-1717-LPS) ("CMO 4"), which related to certain document retention obligations of the parties;

WHEREAS, on March 13, 2009 the Court entered a Stipulation and Order Modifying Case Management Order No. 4 (D.I. 1639 in Docket 05-1717-LPS) ("CMO 4 Modification Order"), which modified certain document retention obligations of the parties;

WHEREAS, pursuant to Case Management Order No. 7 (D.I. 1697 in Docket 05-1717-LPS), fact discovery in this action was closed on June 12, 2009;

WHEREAS, the parties now agree, subject to the approval of the Court, that portions of the CMO 4 Modification Order should be amended and clarified to further relieve certain

document retention burdens, and to specifically identify what documents Intel must continue to retain in connection with this matter;

NOW, THEREFORE, the parties, through their respective counsel of record, hereby stipulate, subject to the approval of the Court, as follows:

1. Paragraph 4 of the CMO 4 Modification Order shall be stricken.
2. In connection with this action, Intel Corporation shall continue to retain the complete discovery record related to this matter, including any documents that were produced or that were withheld on grounds of privilege, pending final resolution of this action, including during the pendency of any appeal.
3. This Stipulation and Order is without prejudice to any party's right to file a motion for sanctions related to evidence preservation.
4. Any document disposition actions taken by Intel pursuant to this Stipulation and Order shall not be raised by the parties in support or defense of any motion for sanctions related to evidence preservation.

/s/ J. Clayton Athey

James L. Holzman (#663)
jlholzman@prickett.com
J. Clayton Athey (#4378)
jcathey@prickett.com
Prickett Jones & Elliott, P.A.
1310 King Street
P.O. Box 1328
Wilmington, DE 19899
(302) 888-6509
Interim Liaison Counsel and Attorneys
for Phil Paul, on behalf of himself and
all others similarly situated

/s/ W. Harding Drane, Jr.

Richard L. Horwitz (#2246)
rhorwitz@potteranderson.com
W. Harding Drane, Jr. (#1023)
wdrane@potteranderson.com
Potter Anderson & Corroon LLP
Hercules Plaza, 6th Floor
1313 N. Market Street
P.O. Box 951
Wilmington, DE 19890-0951
(302) 984-6000
Attorneys for Intel Corporation and
Intel Kabushiki Kaisha

ENTERED this 21st day of February, 2011.


Vincent J. Poppiti (DSBA No. 100614)
Special Master

SO ORDERED this 23rd day of February, 2010.


United States District Court Judge